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Attorneys for Defendant, Patrick M. Byrne

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ROBERT HUNTER BIDEN,
Plaintiff,
vs.
PATRICK M. BYRNE,
Defendant.

Case No.: 2:23-CV-09430-SVW-PD

**NOTICE AND REQUEST TO
APPEAR VIA ZOOM FOR STATUS
CONFERENCE; DECLARATION OF
JOHN W. HOWARD**

Date: 3/18/24

Time: 3:00 p.m.

TO THE COURT:

PLEASE TAKE NOTICE THAT John W. Howard, newly retained counsel for Defendant Patrick M. Byrne requests permission to appear via Zoom for the Status Conference set for March 18, 2024 at 3:00 p.m.

Earlier today, Mr. Howard previously filed his Notice to Appear (Dkt #34). Due to the recent retention as defense counsel, there is insufficient time to file a

1 proper request to appear remotely at today's Status Conference. However, given the
2 circumstances, as discussed in the Declaration of John W. Howard below, good cause
3 exists to grant him permission to appear remotely at the Status Conference at 3:00
4 p.m.

5 Respectfully submitted,

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8 Dated: March 18, 2024

JW HOWARD/ ATTORNEYS, LTD.

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10 By: 

11 John W. Howard
12 Scott J. Street
13 Attorneys for Defendant
14 Patrick M. Byrne

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DECLARATION OF JOHN W. HOWARD

I, John W. Howard, hereby declare and request as follows:

1. Over this past weekend, was retained by the Defendant Mr. Byrne.

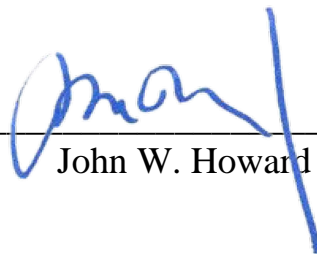
2. On March 18, 2024, I submitted my Notice of Appearance (Doc #34). Due to my recent appearance in this case, there is insufficient time to file a proper request for a remote appearance as required.

3. Given the circumstances, I respectfully request that the Court allow me to appear remotely this afternoon at 3:00 p.m. for the Status Conference. I have been made aware of the procedural history of the case and its status and will be sufficiently prepared to speak at this afternoon's conference on behalf of my client, Mr. Byrne.

4. Mr. Byrne's prior counsel will not appear at the hearing today and as such, Mr. Byrne could be prejudiced by not having counsel at the hearing.

5. Based on the above, good cause exists to allow me to appear remotely at today's Status Conference.

I declare under penalty of perjury under the laws of the United States of America. Signed March 18, 2024 at San Diego, California.



John W. Howard

CERTIFICATE OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed by JW Howard/Attorneys, LTD. in the County of San Diego, State of California. My business address is 600 West Broadway, Suite 1400, San Diego, California 92101.

On March 18, 2024, I electronically filed the **NOTICE AND REQUEST TO APPEAR VIA ZOOM FOR STATUS CONFERENCE; DECLARATION OF JOHN W. HOWARD** and served the documents using the Court's Electronic CM/ECF Service which will send electronic notification of such filing to all registered counsel.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 18, 2024 at San Diego, California.

/s/ Dayna Dang

Dayna Dang, Paralegal

dayna@jwhowardattorneys.com

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